

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

DEBORAH ROBERTS,

PLAINTIFF,

v.

RICHARD BEAVERS GALLERY, RICHARD BEAVERS, AND  
LYNTHIA EDWARDS

DEFENDANTS.

CASE NO. 1:22-cv-4516

**Defendants' Notice of Motion  
to Dismiss Plaintiff's Second  
Amended Complaint**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendant's Motion to Dismiss, and upon all prior proceedings herein, Defendants Richard Beavers Gallery, Richard Beavers, and Lynthia Edwards hereby move this Court, before the Honorable LaShann DeArcy Hall, at the United States Courthouse for the Eastern District of New York located at 225 Cadman Plaza East, Brooklyn, New York, 11201, for an Order (i) pursuant to Fed. R. Civ. P. 12(b)(6) dismissing the Second Amended Complaint of Plaintiff Deborah Roberts with prejudice; and (ii) such other and further relief that the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with Local Civil Rule 6.1(b) of the Eastern District of New York, and the Order issued by this Court on January 19, 2023, opposition papers must be served no later than February 15, 2023.

Dated: February 1, 2023

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ Maaren A. Shah

Maaren A. Shah

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Gallery, Richard Beavers, and Lynthia  
Edwards*